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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

No. 2:25-cv-01866-AC

BRAD CHRISTOPHER OLIVER,

Plaintiff,

v.

COMMISSIONER OF SOCIAL
SECURITY,

Defendant.

STIPULATION FOR EXTENSION TO RESPOND
TO PLAINTIFF'S MOTION FOR SUMMARY
JUDGMENT

IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that the time for responding to Plaintiff's motion for summary judgment be extended from October 24 to November 24, 2025. This is Defendant's first request for an extension.

At the end of the day on September 30, 2025, the appropriations that have been funding the Department of Justice expired and appropriations to the Department lapsed. The same is true for most Executive agencies, including federal defendant Social Security Administration (SSA). It is not clear when funding will be restored by Congress.

Absent an appropriation or continuing resolution, Department of Justice and SSA attorneys are prohibited from working, even on a voluntary basis, except in very limited circumstances, including “emergencies involving the safety of human life or the protection of property.” 31 U.S.C. § 1342. That exception is not deemed to include most civil cases.

Undersigned counsel for therefore requests an extension of time for 30 days. Subsequent to restored appropriations, counsel may also need to request extensions on other impacted deadlines.

The parties further stipulate that the Court’s Scheduling Order shall be modified accordingly.

- Defendant shall file a responsive brief on or before November 24, 2025;
- Plaintiff’s optional reply will be due within 14 days of the filing of Defendant’s brief (on or before December 8, 2025).

Respectfully submitted,

DATE: October 1, 2025

/s/ Paul Sachelari*
PAUL SACHELARI
Attorney for Plaintiff
(* approved via email on 10/1/25)

ERIC GRANT
United States Attorney

DATE: October 1, 2025

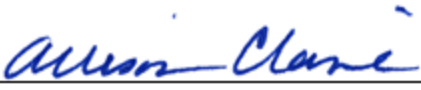
By s/ Marcelo Illarmo
MARCELO ILLARMO
Special Assistant United States Attorney

Attorneys for Defendant

ORDER

APPROVED AND SO ORDERED:

Dated: October 1, 2025



ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE